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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

NORTHWEST CENTER FOR
ALTERNATIVES TO PESTICIDES,
WILLAMETTE RIVERKEEPER,
CASCADIA WILDLANDS, NEIGHBORS
FOR CLEAN AIR, AND 350PDX,

Plaintiffs,

vs.

U.S. DEPARTMENT OF HOMELAND
SECURITY; CHAD WOLF, in his capacity

No. 3:20-cv-01816

**STANDING DECLARATION OF
DOMINICA NAVARRO,
NORTHWEST CENTER FOR
ALTERNATIVES TO
PESTICIDES STAFF AND
MEMBER**

as Acting Secretary, U.S. Department of
Homeland Security,
Defendants.

I, DOMINICA NAVARRO, declare as follows:

1. My name is Dominica Navarro. I am over 18 years of age. I make this declaration based on my own personal knowledge, and if called as a witness, I could and would competently testify to the facts herein under oath. As to matters which may reflect a matter of opinion, they reflect my personal opinion and judgment based on my personal experience.

2. I have been a supporter of Northwest Center for Alternatives to Pesticides (NCAP) since 2016 and became a staff member in 2019. My position with NCAP is Healthy People and Communities Program Coordinator and I reside in Warm Springs, Oregon.

3. NCAP advocates for the protection of community and environmental health and provides information about the impacts of chemicals on our health and that of our communities.

4. I visit Portland frequently for both personal and professional reasons, and engage in organizing activities that specifically work to reduce toxic harms and increase community health in Portland and the greater Northwest region.

5. I have participated in protests, rallies, and other forms of political protest in many cities in the United States but never have I witnessed such excessive use of tear gas in such quantities, night after night, as I have seen happening in Portland.

6. On September 5, 2020, following George Floyd's murder, I participated in the 100th day of protests supporting Black Lives Matter. I attended as a support medic and general attendee. Upon arrival, the gathering was immediately deemed a riot and the use of tear gas began. Tear gas was deployed on protestors despite the peaceful movement and collective calls for justice.

7. I was at the demonstration for several hours wearing an N95 mask and eye protection, all the while, surrounded by the smoke of tear gas which affected my sight and breathing despite the PPE I wore. After returning home from the demonstration, I immediately started my menstrual cycle, though I was not due to begin. My period began heavy, which is

abnormal, was unexpected and lasted several days.

8. Earlier this summer, I was contacted by a concerned citizen of Portland who notified me that their friend had been taken to the hospital for respiratory complications for simply residing in the downtown city area. This person did not attend any of the nightly protests.

9. The concerned citizen wanted to know what information I had, as an NCAP employee, for her friend about the chemicals being used and what they should do about their and their community's concerns about the abundant use of unknown chemicals around their homes.

10. As the demonstrations continued, I became increasingly concerned about the extensive use of tear gas on protestors and people I know. Through personal networks, I learned about the canisters that were being collected and documented. I also learned of the increased force and use of Adamsite when federal police were in attendance.

11. A personal contact and NCAP member expressed concern to me directly about the health impacts they have experienced after participation in Portland protests. However, they are afraid of coming forward as a declarant in this matter due to fear of government retaliation and being targeted in their personal and professional life. It is thus imperative that NCAP be able to act on behalf of its members and protect their interests.

12. I believe that the lack of information and analysis by the federal government about the repeated use of tear gas and other aerosols created conditions in which numerous adverse and unknown health impacts, including to my own health, were able to occur.

13. If the federal government completes a NEPA analysis of the use of tear gas and other crowd control weapons on human health and the environment, I believe the federal government could make better, more informed choices about their use of such weapons. With a completed NEPA analysis, I believe the federal government would not deploy these gases, or at least, not in such quantities at current and future protests in Portland and beyond.

14. I have definite plans to continue engaging with the protestors' demands for social justice in Portland.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of October, 2020.

A handwritten signature in black ink, appearing to read "D. Navarro", with a stylized flourish at the end.

Dominica Navarro